

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Jorge PARAS-ESPINOSA,
a/k/a Jorge Hisrrael PARRAS-ESPINOZA

Case No.

Case: 2:25-mj-30396

Assigned To : Unassigned

Assign. Date : 6/20/2025

Description: RE: JORGE
PARAS-ESPINOSA (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.


On or about the date(s) of June 17, 2025 in the county of Macomb in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 8, United States Code, Section 1326(a)

Unlawful Re-entry after Removal from the United States

This criminal complaint is based on these facts:

On or about June 17, 2025, in the Eastern District of Michigan, Jorge PARAS-ESPINOSA, an alien from Mexico was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about October 16, 2013, at or near Brownsville, Texas, and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.

 Mark I. Vincent, Border Patrol Agent
 U.S. Department of Homeland Security

Sworn to before me and signed in my presence.

Date: June 20, 2025City and state: Detroit, Michigan

 Judge's signature

David R. Grand, United States Magistrate Judge
 Printed name and title

I, Mark I. Vincent, declare the following under penalty of perjury:

1. I am a United States Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since December 14, 2009. Currently, I am assigned to the Marysville Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol agents and records checks of law enforcement databases. I have also reviewed the official immigration file and system automated data relating to Jorge PARAS-ESPINOSA, which attests the following:
2. The information set forth below is for the limited purpose of establishing probable cause. Therefore, this affidavit does not necessarily contain all the information collected during my investigation.
3. Jorge PARAS-ESPINOSA, a/k/a Jorge Hisrrael PARRAS-ESPINOZA, is a forty-three-year-old native and citizen of Mexico, who last re-entered the United States at or near an unknown place, on or about an unknown date, without being admitted, inspected or paroled by an Immigration Officer.
4. On or about April 10, 2000, PARAS-ESPINOSA was arrested by United States Border Patrol agents at or near Falfurrias, Texas. He was granted a Voluntary Return and returned to Mexico the same day.
5. On or about April 26, 2004, PARAS-ESPINOSA was again arrested by United States Border Patrol agents at or near Laredo, Texas. He was granted a Voluntary Return and returned to Mexico the same day.
6. On or about April 02, 2007, PARAS-ESPINOSA was again arrested by United States Border Patrol agents at or near Lake Charles, Louisiana, and was granted a Voluntary Return to Mexico.
7. On or about April 06, 2007, PARAS-ESPINOSA was removed from the United States to Mexico via the New Orleans, Louisiana, Port of Entry.
8. On or about April 19, 2007, just two weeks later, PARAS-ESPINOSA was again arrested by United States Border Patrol agents at or near Falfurrias, Texas. He was granted a Voluntary Return and returned to Mexico the same day.

9. On or about March 20, 2013, PARAS-ESPINOSA was arrested by United States Border Patrol agents at or near Sarita, Texas. PARAS-ESPINOSA was processed for Expedited Removal.
10. On or about March 23, 2013, PARAS-ESPINOSA was removed from the United States to Mexico via the Brownsville, Texas, Port of Entry.
11. On or about October 05, 2013, PARAS-ESPINOSA was arrested by United States Border Patrol agents at or near Avon, Ohio. PARAS-ESPINOSA's prior order of removal was reinstated.
12. On October 16, 2013, PARAS-ESPINOSA was removed from the United States to Mexico via the Brownsville, Texas, Port of Entry.
13. On or about November 22, 2015, PARAS-ESPINOSA was arrested by the Roane County Sheriff Department in Kingston, Tennessee and charged with Driving Without a License.
14. On or about June 17, 2025, PARAS-ESPINOSA was encountered by U.S. Border Patrol agents at or near Shelby Township, Michigan. PARAS-ESPINOSA's prior order of removal was reinstated.
15. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
16. Review of the alien file (A# xxx xxx 836) for PARAS-ESPINOSA, and queries in U.S. Border Patrol computer databases confirm no record exists of PARAS-ESPINOSA obtaining the express permission from the Attorney General or the Secretary of the Department of Homeland Security to re-enter the United States following his last departure on October 16, 2013.

17. Based on the above information, I believe there is probable cause to conclude that Jorge PARAS-ESPINOSA, is an alien who was found in the United States after removal, without the express permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission into the United States in violation of Title 8 U.S.C. § 1326(a).



Mark I. Vincent, Border Patrol Agent
U.S. Department of Homeland Security

Sworn to before me and signed in my
presence and/or by reliable electronic means



Honorable David R. Grand
United States Magistrate Judge

June 20, 2025